



2019-04-29

## Tucows Comments on the Proposed Renewals of the .ORG, .INFO and .BIZ Registry Agreements

Tucows is the leading provider of reseller domain name registration services, and the second largest registrar, with tens of millions of domains under management across our various brands (OpenSRS, Enom, EPAG, and Ascio).

We do not support lifting existing price caps on annual registration fees for consumers, given the history of these legacy top-level domains and the reasonable pricing expectations of the millions of customers who register and renew domains in these TLDs. While individual domains are typically inexpensive, the costs of switching between them for an organization can be exceptionally high. Moving from one TLD to another might require notifying clients, reprinting materials, updating databases, and reconfiguring services. Consequently as consumers are locked in, there either needs to be competition at the registry level, or some form of price constraint.

Given the nature of the contracts, specifically presumptive renewal for the incumbent registry operators, registry prices are not subject to competition and do not face the downward pricing pressure that every other provider of Internet infrastructure faces.

Thank you for the opportunity to provide advice and comment on possible changes to certain registry accreditation agreements between ICANN and the providers of registry services.

Regards,

Graeme Bunton,  
Director of Policy